

REMARKS

Reconsideration and allowance of the subject application in view of the foregoing amendments and the following remarks is respectfully requested.

Claims 1-3, 7-9, 11-13, 17-19, 21-25, 29-31, 33, 39, 45, and 51 remain pending in the application. Claims 4, 14, 26, 34-36, 40-43, 47, 50 have been cancelled without prejudice or disclaimer. Several previously presented claims have been amended to better define the claimed invention and/or improve claim language. The amended claims find solid support in the original specification and drawings, especially page 14, line 10 and page 23, line 8. No new matter has been introduced through the foregoing amendments.

The new grounds of rejection are noted. Although Applicants do not necessarily agree with the Examiner's position, amendments have nevertheless been made solely for the purpose of expediting prosecution.

In particular, all independent claims now recite that a WCDMA dummy pilot signal is transmitted from a peripheral base transceiver station (BTS) of a CDMA-2000 system located in a border area between the WCDMA network and the CDMA-2000 network. In other words, the claimed invention requires that equipment of one network (i.e., CDMA-2000 BTS) transmit a dummy pilot signal for another network (i.e., WCDMA dummy pilot signal).

Embodiments of the claimed invention provide an advantage in that a multimode terminal in the WCDMA network can initiate a handover to the CDMA-2000 network without having to detect CDMA-2000 signals, thereby conserving power that would be otherwise consumed by the CDMA-2000 circuitry of a known device for detecting CDMA-2000 signals. The above claim feature and advantage of disclosed embodiments are neither disclosed, taught nor suggested by the applied art of record.

In particular, the primary reference of *Choi* discloses a method of implementing handoffs between heterogeneous networks using different communication schemes, e.g., WCDMA and CDMA. The *Choi* method is based on the number of neighbor WCDMA cells that a multimode terminal can detect at a given time. If the number of the neighbor WCDMA cells is smaller than a predetermined threshold, e.g., 6, (see box 415 in FIG. 4 of *Choi*) the multimode terminal proceeds to a WCDMA-to-CDMA handoff process (boxes below 415 in FIG. 4). Otherwise, the WCDMA service is maintained (boxes above 415 in FIG. 4). See also *Choi* at paragraphs 0050, 0051.

Thus, the *Choi* method proposes a handoff procedure based entirely on equipment of the *same* network (i.e., WCDMA neighbor cells) that the multimode terminal is currently on. In contrast, the claimed invention relies on equipment of the *other* network (i.e., CDMA-2000 BTS) that the multimode terminal is to be handed-over to.

Further, since the *Choi* multimode terminal detects WCDMA neighbor cells on the same WCDMA network that it is currently on, any pilot signals received at the multimode terminal from such WCDMA neighbor cells must be *real* WCDMA pilot signals. In contrast, the claimed invention requires that a WCDMA *dummy* pilot signal to be detected, because it comes not from within the WCDMA network, but from across the border, i.e., from a CDMA-2000 BTS.

Accordingly, Applicants respectfully submit that the claimed invention is distinguishable from *Choi* in both the signal to be detected (dummy v. real) and the equipment for transmitting such signal (i.e., CDMA-2000 BTS v. WCDMA neighbor cells). The reference therefore does not teach or suggest the claimed invention.

The deficiencies of *Choi* are not deemed curable by the teaching reference(s) of *Akhteruzzaman*, which is relied on for other features. Therefore, the independent claims are patentable over the applied art of record.

The dependent claims, including any new claim(s), are considered patentable at least for the

reason(s) advanced with respect to the respective independent claim(s).

Accordingly, all claims in the present application are now in condition for allowance. Early and favorable indication of allowance is courteously solicited.

The Examiner is invited to telephone the undersigned, Applicant's attorney of record, to facilitate advancement of the present application.

To the extent necessary, a petition for an extension of time under *37 C.F.R. 1.136* is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,

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